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23 **UNITED STATES DISTRICT COURT**

24 **NORTHERN DISTRICT OF CALIFORNIA**

25 **SAN FRANCISCO DIVISION**

26 MAXIMILIAN KLEIN, et al.,

27 Case No. 20-cv-08570-JD

28 Plaintiffs,

15 Hon. James Donato

16 v.

17 **ADVERTISER PLAINTIFFS'  
18 ADMINISTRATIVE MOTION TO  
19 CONSIDER WHETHER CLEVELAND  
20 RESEARCH COMPANY, LLC'S  
21 MATERIAL SHOULD BE SEALED**

22 META PLATFORMS, INC.,

23 Defendant.

1 Pursuant to Civil Local Rule 79-5(f), Advertiser Plaintiffs hereby file this Administrative  
 2 Motion to Consider Whether Cleveland Research Company, LLC's Material Should Be Sealed. Per  
 3 the accompanying Declaration of Brian J. Dunne, certain documents and information referenced in  
 4 the concurrently filed discovery dispute letter have been designated by nonparty Cleveland Research  
 5 Company, LLC ("CRC") as "Confidential" or "Highly Confidential" under the Stipulated Protective  
 6 Order (Dkt. No. 314).

7 Portions of the discovery dispute letter referencing or reflecting the contents of the designated-  
 8 as-confidential documents and information have been redacted from the publicly filed version of the  
 9 letter, and an unredacted version of the letter with the information designated "Confidential" or  
 10 "Highly Confidential" by CRC highlighted in green is filed herewith. *See* Civ. L.R. 79-5(e), (f)(1).<sup>1</sup>

11 Advertiser Plaintiffs respectfully request that the Court grant their motion to consider whether  
 12 the above-referenced CRC material should be sealed.

13  
 14 Dated: April 17, 2023

Respectfully submitted,

15 By: /s/ Brian J. Dunne

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25  
 26 <sup>1</sup> Plaintiffs' discovery dispute letter also contains information designated "Confidential" or "Highly  
 Confidential" by Defendant Meta Platforms, Inc. and nonparty Netflix, Inc. This information has been  
 27 highlighted in yellow (for Meta) and red (for Netflix) in the unredacted version of the discovery  
 dispute letter filed with this motion.

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